



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHEAST REGIONAL OFFICE

ARGEO PAUL CELLUCCI  
Governor

TRUDY COXE  
Secretary

DAVID B. STRUHS  
Commissioner

December 16, 1997

Linda Charpentier, Site Manager  
Polaroid Corporation  
238 South Main Street  
Assonet, Massachusetts 02702

RE: FREETOWN--Industrial Wastewater  
Branch BWP--Polaroid Corporation  
at 238 S. Main Street  
Sewer Connection Permit Number  
119321/S97CI015B

Dear Ms. Charpentier:

Enclosed is your Sewer Connection Permit, issued pursuant to the Massachusetts Clean Water Act (the "State Act"), M.G.L. Ch. 21, Section 26-53, as amended, and the promulgated regulations thereunder.

This permit is an action of the Department of Environmental Protection and is effective upon issuance. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within thirty (30) days of the date this permit was issued.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the permit is not consistent with applicable laws and regulations.

The hearing request, along with a valid check payable to the Commonwealth of Massachusetts, in the amount of \$100.00 must be mailed to:


Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

The request for a hearing will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions pertaining to this matter please contact Robert Greene at the Regional Office at (508) 946-2826.

Very truly yours,

  
John K. Winkler, Chief  
Permit Section  
Bureau of Waste Prevention

W/RWG/re

Attachment

cc: City of Fall River Sewer Commission  
Government Center  
Fall River, MA 02722  
ATTN: Terrance Sullivan,  
Asst. Supervising Engineer

Capaccio Environmental Engineering, Inc.  
75 Union Avenue  
Sudbury, MA 01776  
ATTN: Robert S. Capaccio, P.E.

RESPONSE TO COMMENTS

Polaroid Corporation  
238 South Main Street  
Assonet, Massachusetts 02702

Permit No. 119321/S97CI015B

RE: Sewer Connection Permit Number 119321/S97CI015B

The following is the Department of Environmental Protection's response to comments received from Polaroid Corporation and its consultant, Capaccio Environmental Engineering, Inc. during the 30 day Public Comment Period. The Public Notice was published on August 18, 1997. The Public Notice Period closed on September 17, 1997.

Comment:

Polaroid Corporation proposes that SPECIAL CONDITION 4. A. be reworded as follows:

"Reporting of new chemical uses under this sewer connection permit shall be at the discretion of Polaroid provided that the Chief Wastewater Operator, or his alternate, reviews the new uses and documents in the facility records that the wastewater resulting from the usage of the new chemical will not adversely affect the operations of the on-site industrial wastewater treatment facility (IWWTF) and will not result in a violation of the applicable effluent limitations."

RESPONSE:

Pursuant to 314 CMR 2.09, the Department has changed the reporting requirement to one that requires the maintenance of records on-site.

COMMENT:

Polaroid Corporation suggests that the following item be added to the industrial wastewater holding tank section which was noted in the cover letter of the Draft Permit.

"3) As an alternative to off-site disposal, and at the discretion of Polaroid, should Polaroid's Chief Wastewater Operator, or his alternate, decide that the temporary industrial wastewater holding tank(s) contents can be discharged to the on-site industrial wastewater treatment facility without adversely affecting its operations or resulting in a violation of the applicable effluent limitations, such on-site treatment will be allowed."

RESPONSE:

Pursuant to 314 CMR 2.09, this condition has been incorporated into Special Condition 4.

COMMENT:

Polaroid Corporation's previously-issued State permit included mass-based limits and Polaroid Corporation requests mass-based limits be included in this permit.

RESPONSE:

Pursuant to 314 CMR 2.09, the Department will include a table with mass-based limits in the permit.

MASSACHUSETTS DEP SEWER CONNECTION  
ATTACHMENT A

(22) SPECIAL CONDITIONS (DEP)

PERMIT NO. 119320/S97CI015B

1. Polaroid Corporation is authorized to discharge industrial wastewater to the City of Fall River sewer system, located at:

Polaroid Corporation  
238 So. Main Street  
Freetown, MA 02702

2. This permit authorizing the discharge expires five (5) years from the date of issuance. The permittee shall apply for a renewal of this permit ninety (90) days prior to the expiration date in accordance with 314 CMR 7.09(3b) for continued lawful discharges beyond the expiration date.
3. Reopener Clause: The Department reserves the right to make appropriate revisions to this permit in order to establish any appropriate effluent limitations or other provisions which may be authorized under the Clean Water Act in order to bring all discharges into compliance with the Clean Water Act.
4. (a) Polaroid shall maintain records on-site which document:
  - (1) Current chemical usage;
  - (2) Treatability of wastewaters generated from new chemical use;
  - (3) Treatability of other questionable wastewaters, such as those which may be held in the on-site temporary industrial wastewater holding tanks.

The treatment of industrial wastewaters by the on-site industrial wastewater treatment facility (IWWTF) shall not adversely affect the operations of the on-site IWWTF and shall not result in a violation of the applicable effluent limitations.

- (b) In cases where Polaroid deems the treatment of the new constituents in the wastewater via the on-site IWWTF is questionable, Polaroid shall consult and obtain from a Massachusetts Registered Professional Engineer, either;
  - (1) A statement certifying that the usage of the new chemical will not adversely affect the operations of the IWWTF and that effluent limitations will not likely be violated or;
  - (2) A recommended course of action to otherwise handle the incompatible industrial wastewater.

5. Prior to installation of the proposed temporary industrial wastewater holding tanks (IWWHT) described in the report titled POLAROID CORPORATION CHEMICAL OPERATIONS DIVISION FREETOWN, MASSACHUSETTS dated 2/10/97, prepared by Capaccio Environmental Engineering, Inc., a plan stamped and signed by a Massachusetts Registered Professional Engineer shall be submitted depicting, at a minimum, the following information;
  - (a) Location, size, materials of construction, pumps specifications and profiles of the IWWHT, including location of alarms, vents, inverts, etc.
6. Modifications to the on-site IWWTF shall be reviewed and approved by the Department prior to construction.
7. The wastewater discharge from Polaroid Corporation must comply with the EPA General Pretreatment Regulations for Existing and New Sources of Pollution (40 CFR, Part 403) and the National Categorical Pretreatment Standards found in part in Table 1 (EPA Effluent Guidelines and Standards for Organic Chemicals, Plastics and Synthetic Fibers, Subparts H, Specialty Organic Chemicals, Pretreatment Standards for Existing Sources, 40 CFR Part 414.85 and Subpart K, Indirect Discharge Point Sources, Toxic pollutant standards for indirect discharge point sources, 40 CFR Part 414.111), as well as, the City of Fall River's Industrial Pretreatment Program (IPP), Industrial User Permit #405 issued thereunder, or as renewed, and the terms of the "Agreement for Wastewater Treatment Between City of Fall River, Massachusetts and Town of Freetown" dated February 07, 1992.
8. The permittee shall achieve discharges not exceeding the quantity (mass) determined by using the permitted average daily process wastewater flow (90,000 gallons per day) and the concentration listed in Table 1. The mass limitations are presented in Table 2.
9. All solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed in a manner consistent with applicable Federal and State laws and regulations including but not limited to, the State and Federal Acts, the Massachusetts Hazardous Waste Management Act, M.G.L. c. 21C, and the Federal Resource Conservation and Recovery Act, 42 U.S.C. s. 6901, et seq. 310 CMR 19.00 and 30.000, and other applicable regulations.

10. General prohibitions. No person shall discharge or cause to be discharged to the POTW any substances, materials, or wastewaters that can harm the sewers, wastewater treatment process, or equipment; have an adverse affect on the receiving waters or can otherwise endanger life, limb, public property, or constitute a nuisance. Pollutants introduced into the POTW shall not pass through the POTW or interfere with the operation or performance of the works.
11. Specific prohibitions. In addition, the following pollutants shall not be introduced into the POTW:
  - (a) Pollutants which create a fire or explosion hazard in the POTW;
  - (b) Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.5, unless the works is specifically designed to accommodate such discharges;
  - (c) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference;
  - (d) Any pollutant, including oxygen demanding pollutants released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW;
  - (e) Heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40 degrees Centigrade (104 degrees Fahrenheit) unless the Division, upon request of the POTW, approves alternate temperature limits.

Table 1

<u>Parameter</u>	<u>Discharge Limit</u>	
	<u>Maximum for any monthly average</u>	<u>Maximum for any one day</u>
Acenaphthene	19	47
Anthracene	19	47
Benzene	57	134
Bis (2-ethylhexyl) phthalate	95	258
Carbon Tetrachloride	142	380
Chlorobenzene	142	380
Chloroethane	110	295
Chloroform	111	325
Di-n-butyl phthalate	20	43
1,2-Dichlorobenzene	196	794
1,3-Dichlorobenzene	142	380
1,4-Dichlorobenzene	142	380
1,1-Dichloroethane	22	59
1,2-Dichloroethane	180	574
1,1-Dichloroethylene	22	60
1,2-trans-Dichloroethylene	25	66
1,2-Dichloropropane	196	794
1,3-Dichloropropylene	196	794
Diethyl phthalate	46	113
Dimethyl phthalate	19	47
4,6-Dinitro-o-cresol	78	277
Ethylbenzene	142	380
Fluoranthene	22	54
Fluorene	19	47
Hexachlorobenzene	196	794
Hexachlorobutadiene	142	380
Hexachloroethane	196	794
Methyl Chloride	110	295
Methylene Chloride	36	170
Naphthalene	19	47
Nitrobenzene	2,237	6,402
2-Nitrophenol	65	231
4-Nitrophenol	162	576
Phenanthrene	19	47
Pyrene	20	48
Tetrachloroethylene	52	164
Toluene	28	74
Total Cyanide	420	1,200
Total Lead	320	690
Total Zinc	1,050	2,610
1,2,4-Trichlorobenzene	196	794
1,1,1-Trichloroethane	22	59
1,1,2-Trichloroethane	32	127
Trichloroethylene	26	69
Vinyl Chloride	97	172

All units are micrograms per liter.



Table 2

<u>Parameter</u>	<u>Discharge Limit (pounds per day)</u>	
	<u>Maximum for any monthly average</u>	<u>Maximum for any one day</u>
Acenaphthene	.0142614	.0352782
Anthracene	.0142614	.0352782
Benzene	.0427842	.1005804
Bis (2-ethylhexyl) phthalate	.071307	.1936548
Carbon Tetrachloride	.1065852	.285228
Chlorobenzene	.1065852	.285228
Chloroethane	.082566	.221427
Chloroform	.0833166	.243945
Di-n-butyl phthalate	.015012	.0322758
1,2-Dichlorobenzene	.1471176	.5959765
1,3-Dichlorobenzene	.1065852	.285228
1,4-Dichlorobenzene	.1065852	.285228
1,1-Dichloroethane	.0165132	.045036
1,2-Dichloroethane	.135108	.4308444
1,1-Dichloroethylene	.0165132	.045036
1,2-trans-Dichloroethylene	.018765	.0495396
1,2-Dichloropropane	.1471176	.5959765
1,3-Dichloropropylene	.1471176	.5959765
Diethyl phthalate	.0345276	.0848178
Dimethyl phthalate	.0142614	.0352782
4,6-Dinitro-o-cresol	.0585468	.2079162
Ethylbenzene	.1065852	.285228
Fluoranthene	.0165132	.0405324
Fluorene	.0142614	.035278
Hexachlorobenzene	.1471176	.5959765
Hexachlorobutadiene	.1065852	.285228
Hexachloroethane	.1471176	.5959765
Methyl Chloride	.082566	.221427
Methylene Chloride	.0270216	.127602
Naphthalene	.0142614	.0352782
Nitrobenzene	1.679092	4.805341
2-Nitrophenol	.048789	.1733886
4-Nitrophenol	.1215972	.4323456
Phenanthrene	.0142614	.0352782
Pyrene	.015012	.0360288
Tetrachloroethylene	.0390312	.1230984
Toluene	.0210168	.0555444
Total Cyanide	.315252	.90072
Total Lead	.240192	.517914
Total Zinc	.78813	1.959066
1,2,4-Trichlorobenzene	.1471176	.5959765
1,1,1-Trichloroethane	.0165132	.0442854
1,1,2-Trichloroethane	.0240192	.0953262
Trichloroethylene	.0195156	.0517914
Vinyl Chloride	.0728082	.1291032

**INTERNATIONAL SPECIALTY PRODUCTS**

1361 Alps Road Wayne NJ 07470

(973) 628 4000



February 19, 1998

June Mahala,  
Permitting Section  
Massachusetts Department of Environmental Protection  
20 Riverside Drive  
Lakeville, Massachusetts 02347

Re: Notice of Transfer of the Polaroid Freetown Facility

Dear Ms. Mahala:

This is to confirm that today, Polaroid Corporation (Polaroid) sold its facility at 238 South Main Street, Freetown, Massachusetts to ISP Freetown Acquisition Corp. The purchasing corporation will be renamed as ISP Freetown Fine Chemical Inc. shortly after the transfer. As my earlier letter under Polaroid letterhead indicated, Polaroid assigned its Sewer Connection Permit #119321/S97CI015B as part of the sale.

If you require any additional information, please contact Michael Conway at 781.386.7372.

Very truly yours, =

*Michael Conway*

Michael Conway  
Environmental Manager

cc: Peter Dore, DEP, Boston  
Terrance Sullivan, Fall River

certified mail      Z 456 485 693  
return receipt requested

Domestic  
102555-91-B-0179  
DEP  
SOUTHEAST REGION  
5. Received  
6. Signature: (Address or Agent)  
X  
November 1994  
RETURN TO YOUR OFFICE